



FY12 One Year Action Plan

COMMUNITY DEVELOPMENT BLOCK GRANT AND HOME PROGRAM

1 August 2012

Submitted by:

The Board of Lake County Commissioners

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Expected Resources

AP-15 Expected Resources Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Federal (entitlement)	Housing, Economic Development, Public Services, Infrastructure	\$1,194,056	~\$25,000	\$250,000	\$1,469,056	0	Resources will be used to fund eligible activities such as housing rehabilitation, infrastructure improvements, public facility improvements, and public services. Funds will also be used for Program Administration.
HOME	Federal (entitlement)	CHDO activities, rental subsidy, Multi-family housing	\$364,142	0	\$250,000	\$614,142	0	HOME eligible uses including rental subsidy, security deposits, residence for developmentally disabled, senior housing

Table 44 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The ability to leverage to funds is critical in an era of diminishing funds. Lake County reviews all applications with an emphasis on the applicants' ability to leverage additional resources. While matches are not required for all projects, applicants receive additional points on the application for their ability to leverage funds. This allows Lake County to allocate funds to additional entities and not serve as the sole source finance entity for various projects.

The annual allocation of federal funds in Lake County is estimated to leverage an additional \$3 million dollars in activity.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1. Offer Housing Programs to Provide Safe and Decent Housing for Low-to-Moderate Income Households	2012	2012	Housing	Lake County (excluding Mentor and Waite Hill)	Emergency repairs , General housing repairs (roofs, electrical, window, siding), Mobility Accessibility Program (wheelchair ramps, bathroom modification)	\$400,000	<ul style="list-style-type: none"> ▪ 30 – 40 successful housing rehabilitation projects ▪ Stabilize neighborhood property values
2. Target Infrastructure Improvements in Low-to-Moderate Income Residential Areas	2012	2012	Infrastructure	Income eligible Census Block Groups	Water lines, sanitary sewer lines, storm water repairs, road construction	\$159,734	<ul style="list-style-type: none"> ▪ Stabilize neighborhood property values ▪ Assist with providing safe, sanitary housing

3. Provide Appropriate Supportive Services for Low-to-Moderate Income Persons	2012	2012	Public Services	Lake County; Income eligible persons (limited clientele)	Job training, English literacy, senior services, health care, homeless prevention	\$179,000	<ul style="list-style-type: none"> Increased job opportunities Increased literacy rates Reduced usage of homeless services Increased access to medical/dental services
4. Coordinate efforts between public agencies and Continuum of Care agencies to Address the Issues of the Homeless and Special Needs Population	2012	2012	Homelessness	Lake County	Job Training, counseling, housing opportunities (short thru long term)	\$75,000	<ul style="list-style-type: none"> Reduction of the number of homeless families and individuals through outreach, prevention and supportive services and the efficient coordination of grant opportunities.

5. Promote a regionally coordinated economic development planning strategy, which includes businesses, non-profits, officials from the County and its communities, officials from outside the County, and area residents that identifies ways to create and maintain employment in lower to middle income sectors of the workforce.	2012	2012	Economic Development	Lake County	Business capital / job creation or retention	\$400,000	Issue 2 – 3 loans and create 10-15 jobs
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Table 45 – Goals Summary

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

In FY2012, Lake County estimates that approximately 300 households will receive affordable housing assistance.

Projects

AP-38 Project Summary

Project Summary Information

The National CDBG Objectives established by HUD are used as the basis for assigning priorities to the needs for which funding may be allocated. The National Objectives are to develop viable urban communities by focusing on the following:

- Providing decent housing (DH)
- Providing a suitable living environment (SL)
- Expanding economic opportunities, principally for lower-income persons (EO)

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Eligible Use	National Objective	HUD Matrix Code/ HUD Objective
FY 12 CDBG Projects							

Storm Sewer Improvements	Mentor on the Lake	#2	Infrastructure	\$40,000	570.201 (c)	570.208 (a)(1)	03K/EO-1
Main St. Transportation Project and Streetscape Improvements	City of Painesville	#2, #5	Infrastructure, Job creation	\$75,000	570.201 (c)	570.208 (a)(1)	03K/EO-1
Madison Twp. Park: ADA ramp to public park	Madison Twp. (income eligible census block group)	#2	Infrastructure and accessibility	\$19,734	570.201 (c)	570.208 (a)(1)	03F/SL-1
Fairport Harbor ADA Curb Cuts	Fairport Harbor	#2	Infrastructure and accessibility	\$25,000	570.201 (c)	570.208 (a)(1)	03K/SL-1
ADA Bleachers	Lake County	#2, #3	Accessibility	\$30,000	570.201 (c)	570.208 (a)(2)(A)	03K/SL-1
New Directions for Living: Basement Repair	Painesville	#1, #2, #3	Housing repair	\$17,650	570.201 (c)	570.208 (a)(3)	14A/DH-1
Lake Geauga Recovery Center	Lake County	#1, #2, #3	Housing repair, accessibility	\$13,700	570.201 (c)	570.208 (a)(3)	14A/DH-1
Small Business Loans	Lake County	#5	Economic Development, job creation/retention	\$50,000	570.203 (b)	570.208 (a)(4)(i)	18A/EO-1
Economic Development Loans	Lake County	#5	Economic Development, job creation/retention	\$350,000	570.203 (b)	570.208 (a)(4)(i)	18A/EO-1
Hearts and Hammers	Willowick	#1	Housing	\$25,000	570.202 a)(1)	570.208 (a)(3)	14A/DH-1, DH-2, SL-1
Rebuilding Together	Lake County	#1	Housing	\$25,000	570.202 a)(1)	570.208 (a)(3)	14A/DH-1, DH-2, SL-1
Lake County Housing Rehabilitation	Lake County	#1	Housing	\$350,000	570.202 a)(1)	570.208 (a)(3)	14A/DH-1, DH-2, SL-1

Lake County Church Network	Lake County	#3, #4	Housing, social services	\$10,000	570.201 (e)	570.208 (a)(2)(c)	05/SL-2
Families Moving First	Lake County	#4	Homelessness	\$10,000	570.201 (e)	570.208 (a)(2)	03T/DH-1
Lake County Free Medical	Lake County	#3	Public service (medical)	\$17,000	570.201 (e)	570.208 (a)(2)(D)	05M/SL-1
Lake County Free Medical	Lake County	#3	Public service (dental)	\$10,000	570.201 (e)	570.208 (a)(2)(D)	05M/SL-1
Lifeline	Lake County	#3	Public Services	\$15,000	570.201 (e)	570.208 (a)(2)(D)	05M/SL-1
Ecumenical Shelter	Lake County	#4	Homelessness	\$67,000	570.201 (e)	570.208 (a)(2)	03T/DH-1, SL-1
Forbes House	Lake County	#4	Public service	\$10,000	570.201 (e)	570.208 (a)(2)(A)	05G/DH-1, SL-1
LCGHD: New Born Health Visit	Lake County	#4	Lake County	\$10,000	570.201 (e)	570.208 (a)(2)(D)	05L/SL-1, SL-2
Painesville ABLE	Lake County	#4	Public service	\$10,000	570.201 (e)	570.208 (a)(1)	05/EO-1
Neighboring Employment Services	Lake County	#3, #4	Public service, job training	\$20,000	570.201 (e)	570.208 (a)(2)(A)	05H/EO-1
Program Administration	Lake County	#1-#5	Administration	\$198,811	570.206	N/A	21A
Fair Housing Activities	Lake County	#1, #3, #4	Administration/ Housing/Public Service	\$40,000	570.206	N/A	21D/DH-1

FY 12 HOME Projects										
TBRA										
Extended Housing, Inc. (Subsidy);	Lake County	#1, 3, 4	Housing, support, Homelessness	\$36,000	92.209	Affordable Housing	05T			
TBRA										
Lifeline, Inc. (Subsidy)	Lake County	#1,3, 4	Housing, support services, Homelessness	\$36,000	92.209	Affordable Housing	05T			
TBRA										
Fair Housing Resource Ctr, (Retention);	Lake County	#1, 3, 4	Housing, support services, Homelessness	\$50,000	92.209	Affordable Housing	05T			
TBRA										
Lifeline Inc. (Placement)	Lake County	#1, 3, 4	Housing, support services, Homelessness	\$81,216.50	92.209	Affordable Housing	05T			

Acquisition & Rehabilitation No Coast Comm. Homes	Lake County	#1, 3, 4	Housing, support services, special needs	\$ 50,000.00	92.205	Affordable Housing	12
Rental - New Construction NRP Group	Lake County	#1, 3, 4	Housing, support services, special needs	\$ 75 000.00	92.205	Affordable Housing	12
Program Administration County staff	Lake County	#1-#5	Administration	\$19,628.50	92.207	N/A	21A
Program Administration Forbes House	Lake County	#1-#5	Administration	\$16,840.00	92.207	N/A	21A
Previous Years HOME funds							
TBRA Forbes House Subsidy		#1, 3, 4	Housing, support services, Homelessness	\$56,000.00	92.209	Affordable Housing	05T
Acquisition & Rehabilitation No Coast Comm. Homes	Lake County	#1, 3, 4	Housing, support services, Special needs, Homelessness	\$ 50,000.00	92.205	Affordable Housing	12
Rental - New Construction NRP Group	Lake County	#1, 3, 4	Housing, support services, Special needs	94,000.00	92.205	Affordable Housing	12

Rental - PSH New Construction Extended Housing	Lake County	#1, 3, 4	Housing, support services, Homelessness	\$ 50,000.00	92.205	Affordable Housing	03C
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Table 46 – Project Summary

AP-35 Projects

#	Project Name
CDBG Projects	
1	Mentor on the Lake Storm Sewer Project
2	Main St. Transportation Project and Streetscape Improvements
3	Madison Twp. Park: ADA ramp to public park
4	Fairport Harbor ADA Curb Cuts
5	New Directions for Living: Basement Repair
6	Lake Geauga Recovery Center (Bathroom renovations)
7	Small Business Loans
8	Economic Development Loans
9	Hearts and Hammers
10	Rebuilding Together
11	Lake County Housing Rehabilitation
12	Lake County Church Network
13	Families Moving First (Homeless Family Day Shelter)
14	Lake County Free Medical
15	Lake County Free Medical
16	Lifeline
17	Ecumenical Shelter (Homeless Shelter)
18	Forbes House
19	Lake County General Health District New Born Health Visits
20	Painesville ABLE: Adult Education
21	Neighboring Employment Services
22	Program Administration
23	Fair Housing Activities
HOME Funds	
24	Extended Housing Rental Subsidy (veterans)
25	Fair Housing Resource Center (short term rental subsidy)

26	Forbes House
27	Lifeline Long Term Rental Subsidy
28	Lifeline Security Deposit
29	Fairway Pines Senior Housing
30	Northcoast Homes Developmentally Disabled Housing
31	HOME Administration

Table 47 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The National CDBG Objectives established by HUD are used as the basis for assigning priorities to the needs for which funding may be allocated. The National Objectives are to develop viable urban communities by focusing on the following:

- Providing decent housing (DH)
- Providing a suitable living environment (SL)
- Expanding economic opportunities, principally for lower-income persons (EO)

In FY12, as revealed in the surveys conducted for the Consolidated Plan, Lake County will invest significant funds in economic development, housing rehabilitation and infrastructure improvements. While these projects provide specific benefits to the community or resident, they also create job opportunities for low-moderate income local residents.

Furthermore, notably with Housing Rehabilitation Program, significant business opportunities are a result of these initiatives. The housing program will also assist in stabilizing neighborhood property values and assist to stimulate additional private investment in areas that may have lost homeowners over the past five years.

Economic development funds (business loans) are an important tool as Lake County and the region emerge the recession of 2008-2009. Correspondence from business and community development leaders has expressed appreciation for the availability of the funds as a source of supplemental of gap financing. The County is committed to promoting the reuse, rehabilitation or expansion of existing commercial/industrial

structures to attract or retain new businesses. The County will also focus on the equipment and machinery related needs of the private sector to assist in their efforts to remain competitive in the marketplace.

As past practices have proved successful in determining community needs, the County will continue to work closely with all governmental jurisdictions, social service organizations, local non-profits and the business community to examine potential obstacles and strategies to effectively address them. Unfortunately, the reduction in funding at all levels has been the primary obstacle. This is occurring while there is a significant increase in the community development and social service needs throughout Lake County.

Existing obstacles include:

- Family homeless shelter
- Economic development loans
- Affordable Senior Housing
- Cost and availability of housing (rental) for low-moderate income persons throughout the entire County

Lake County continues to work with our local communities and non-profits to leverage existing and future resources (personal, financial, facilities) to effectively address the obstacles facing our target populations. This may require significant sacrifice among other programs that have traditionally received funding, but have witnessed a reduction in demand. While this is an uncommon situation, the County will be funding programs to help address the obstacles including, economic development loan programs, a new family day shelter and additional rent subsidies with HOME funds.

AP-50 Geographic Distribution

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

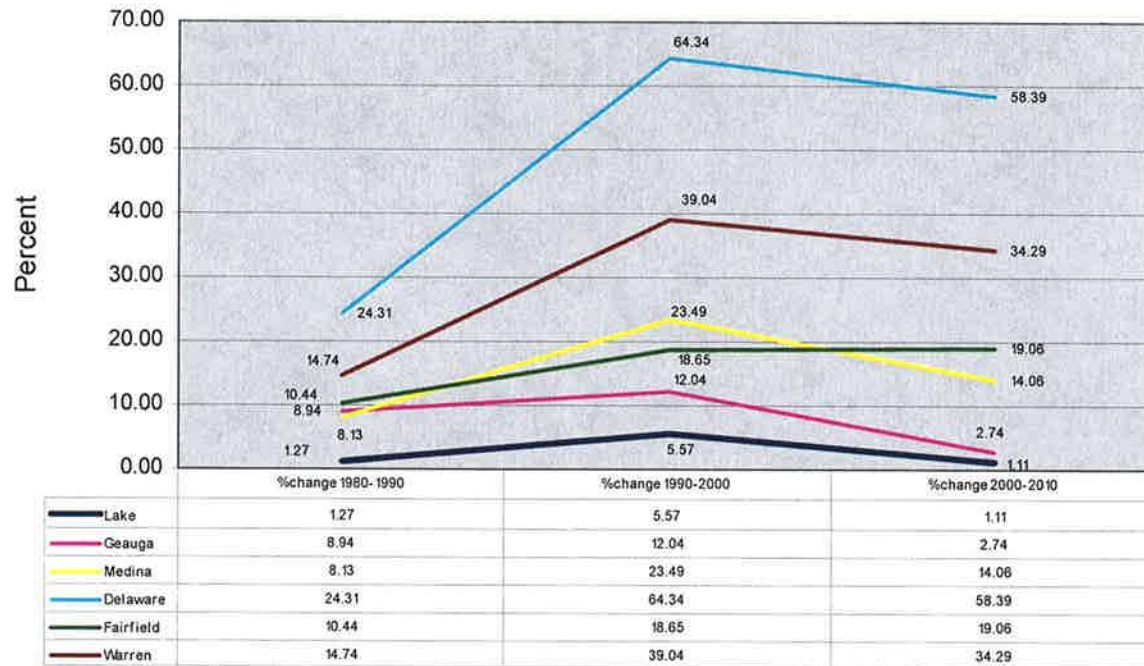
SUMMARY

Located adjacent to Cuyahoga County (Cleveland), the County enjoys approximately 30 miles of Lake Erie shoreline. The County is home to 23 communities, 9 cities, 9 villages and 5 townships with populations ranging from 226 in Lakeline Village to 47,159 in the City of Mentor. Lake County is the geographically the smallest county in Ohio, but ranks 11th in population with 230,041 residents representing a growth of 1.1% from the 2000 Census.

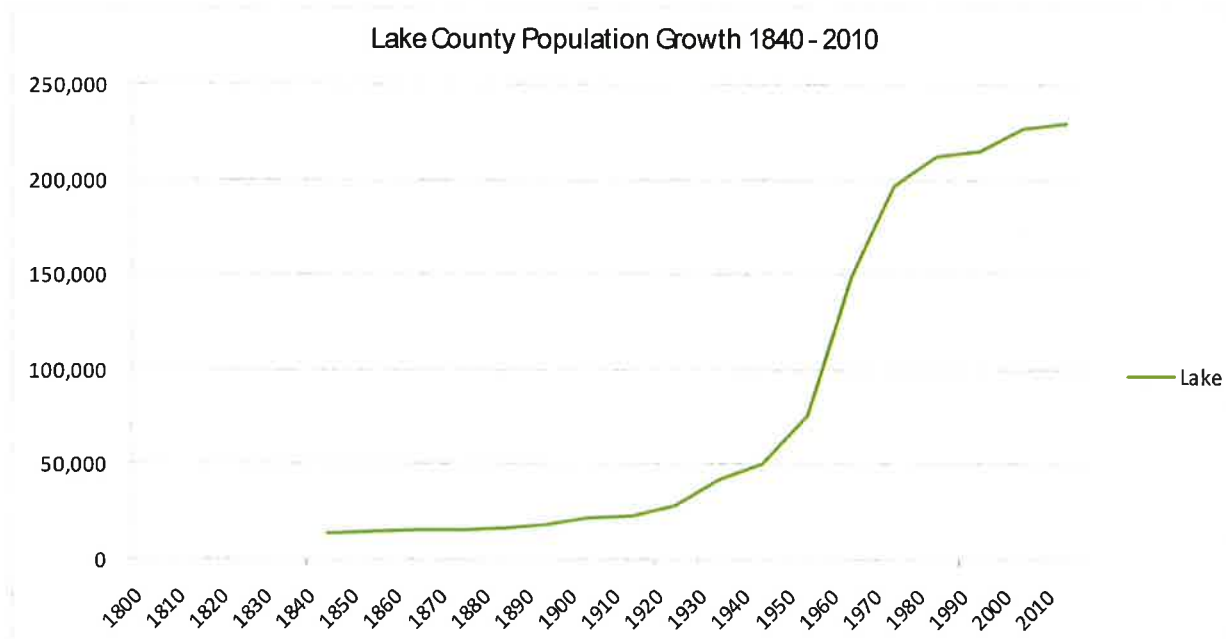


This represents the smallest growth rate from the previous decade since 1980. As noted in the chart below, Lake County experienced tremendous growth during the post WWII era. The population has grown modestly since the population boom from 1960 – 1990. The current rate of population growth for Lake County's communities is corollary with their distance from Cleveland. Suburbs developed immediately after World War II, such as Eastlake, Willowick and Wickliffe, are mostly built out, unable to accommodate large increases in households. Households in older communities are getting smaller, and residents getting older. Despite the abundance of land suitable for building, estate communities south of I-90 have little population growth.

Population Growth Analysis *Percent Change by Decade*



Limited opportunities for subdivision, high land prices, and land use policies discouraging development and promoting rural character, limit the prospect for growth. The growth rate in suburbs developed primarily during the 1960s and 1970s, such as Mentor and Wickliffe, has slowed.



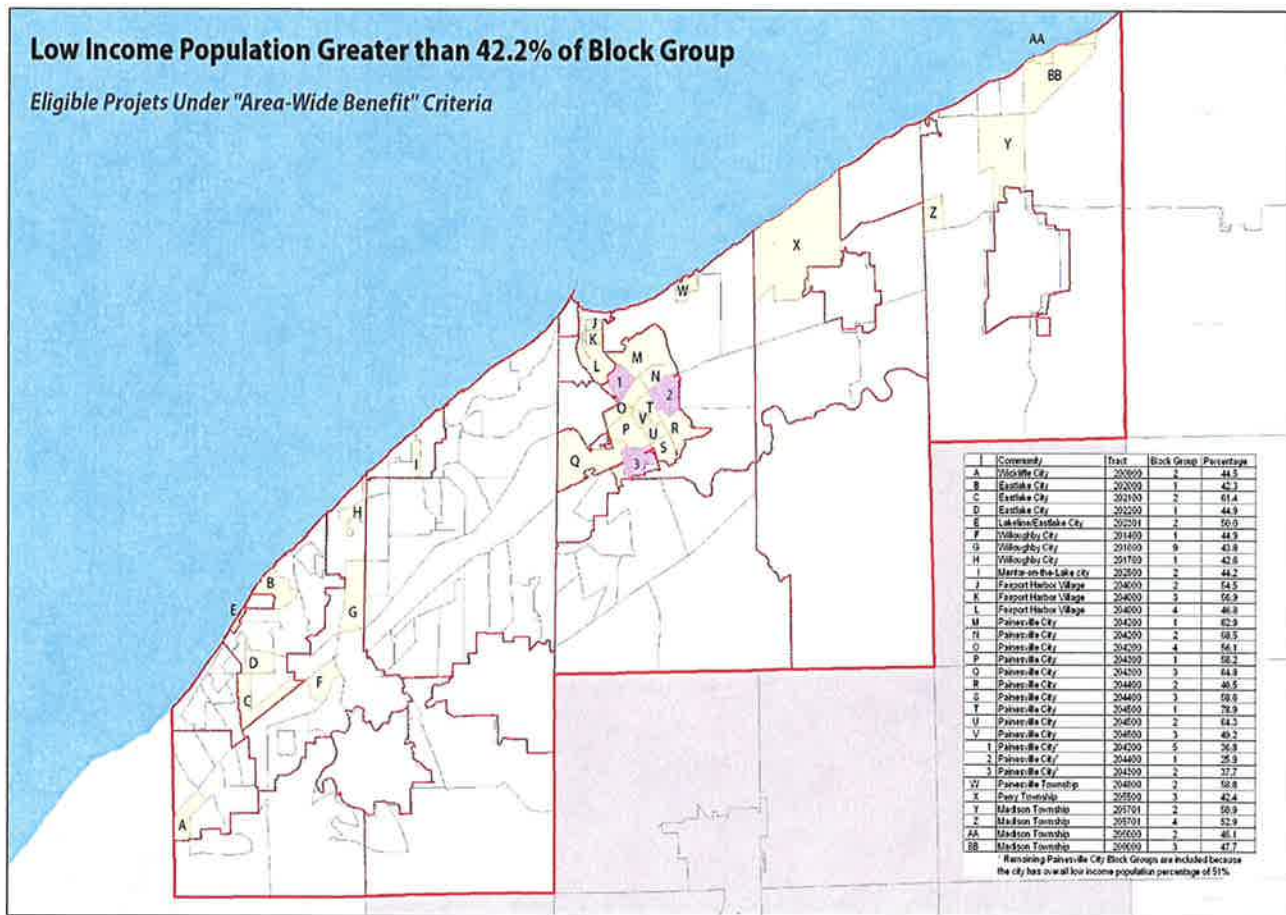
The western portion of the County (adjacent to Cuyahoga County) is densely populated by County standards and is characterized by smaller post WWII homes and a mix of commercial and industrial land uses. Greenfield growth opportunities are minimal in this area.

In addition to residential and industrial activities, central Lake County has a significant retail base. Furthermore, the homes sizes are slightly larger than the western section of the County. The County seat, Painesville, is centrally located in the County and is home to a large number of social service providers and non-profit agencies. Painesville is also home to a growing number of manufacturing companies.

Eastern Lake County is considered the rural area of Lake County. Beginning in eastern Painesville Twp. and extending east and south through Leroy and Madison Townships, the land use pattern consist of large lot homes, scattered industrial/business uses and a predominant nursery industry.

INCOME

According to the 2010 Census, the median household income in Lake County is \$54,896 and per capita income is \$28,221, both above the state and national average.



In western Lake County, areas of low-moderate income block groups are located in multi-family areas throughout, Eastlake, Wickliffe, Mentor on the Lake, Willoughby and Willoughby Hills. These areas are shown in yellow on the map below. Projects in these block groups will qualify on an area wide benefit.

Due to the concentration of public and social service agencies, and the low-moderate income characteristics of Painesville, a significant amount of CDBG and HOME funds will be dedicated to these agencies. While located in the City, a majority of the services provided are applicable to the entire county on a limited clientele basis. Residents from the entire County commute to Painesville to utilize these critical services.

Eligible non-public service projects (public facilities, infrastructure, economic development) in Fairport Harbor and Painesville City will qualify on the area wide benefit category based on the census block income levels.

While the most rural area of the County, the eastern portion of the County contains income eligible census blocks along the Lake Erie shoreline. Potential project in these areas include public facility (parks) and infrastructure upgrades.

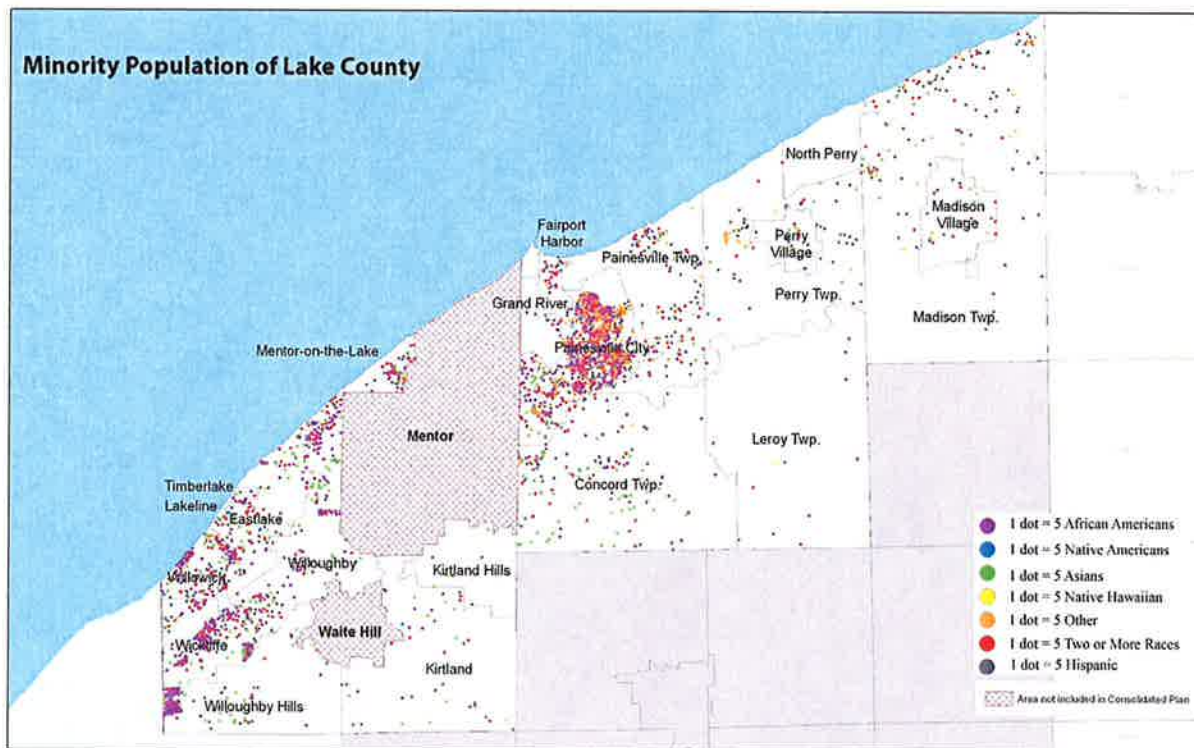
In conclusion, higher geographic priority will be given to projects located in the Census Block groups noted in the map above. An income survey will be required if a proposed project is located in surrounding areas.

Geographic priorities for scattered site projects are difficult to forecast. This includes housing rehabilitation and economic development projects. In these cases income verification will be verified prior to the award of funds.

Limited clientele activities, irrespective of geographic/target areas, will proceed in accordance with the HUD regulations.

MINORITIES

According to Census 2010, 92.5 percent (94.5% in 2000) of the County residents are white. Minority races and ethnic groups include African American, Asian and Hispanic/Latino. As noted on the map below, concentrations of minorities are similar to the low-moderate income census block groups. This includes pockets of Eastlake, Willowick, Willoughby Hills, Willoughby, Wickliffe, Mentor on the Lake, Painesville Township, Painesville City and Fairport Harbor.



Geographic Distribution

Target Area	Percentage of Funds
Scattered Site (countywide, excluding Mentor/Waite Hill) <ul style="list-style-type: none">- Housing Rehabilitation- Economic Development Loans- Public services	70%
Eastern Lake County	10%
Central Lake County	10%
Western Lake County	10%

Table 48 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Lake County strives to allocate the resources on an equal basis among our 21 eligible communities. This distribution is based on:

- Available funds
- Project eligibility
- Proposed beneficiaries
- Ability to leverage funds

Certain communities may not receive funds based on variables noted above, but all entities are permitted to apply for federal funds on an annual basis. Potential applicants are required to attend a pre-application meeting in April to understanding the federal programs, eligible projects and reporting requirements should they receive funding. County staff also reviews the priority of the project based on the local and countywide land use plan and development strategy, where appropriate.

It is difficult to forecast geographic location of the scattered site projects as they are unknown until application by the homeowner or business requesting assistance.

Affordable Housing

AP-55 Affordable Housing

One Year Goals for the Number of Households to be Supported		Totals
<i>Homeless</i>		241
Emergency Shelter – general population	50	
Emergency Shelter – Domestic Violence	68	
Permanent Supportive Housing	17	
Emergency Shelter (placement)	15	
Transitional Housing (from Emergency Shelter)	20	
Transitional Housing (from DV shelter)	6	
Shelter Plus Care	40	
Prevention	25	
<i>Non-Homeless</i>		96
Homeowner & lease purchase	15	
Tenant based – short term (crisis)	25	
Tenant based – mid-term (self sufficiency)	6	
Housing Rehabilitation	50	
<i>Special-Needs</i>		31
Tenant based – long term veterans/disabled	6	
Senior Rental	25	
<i>Total</i>		368

Table 49 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	50
The Production of New Units	2
Rehab of Existing Units	60
Acquisition of Existing Units	44
Total	156

Table 50 - One Year Goals for Affordable Housing by Support Type

The Lake County Housing Rehabilitation Program will support, and help preserve, affordable housing stock by providing housing rehabilitation assistance programs to income eligible residents utilizing \$350,000 in CDBG funds to provide deferred loans to eligible home owners. Through the Housing Rehabilitation Program and Emergency Repair Program assistance is provided to low and moderate income homeowners to have structural improvements made to their homes that eliminate health and safety concerns, and building code violations. The County will also provide home rehabilitation funds to Hearts and Hammers and Rebuilding Together Lake County programs in Willowick and Wickliffe. These programs typically address smaller home repair needs throughout the community and leverage volunteer labor to meet the National Objectives.

In addition, the Lake County Commissioners will provide approximately \$300,000 in HOME funds to North Coast Community Homes, Extended Housing Inc., and NRP Group for various home construction projects ranging from a developmentally disabled home to senior housing development project. These activities will increase the supply of affordable and structurally sound housing for low and moderate income households and individuals in Lake County.

The County's housing programs will continue to work over the next year to overcome the barriers of re-investment in existing affordable housing and the older neighborhoods of the County. These programs encourage private re-investment in the County's housing stock by eliminating substandard housing conditions, creating home ownership opportunities, promoting home maintenance, increasing depressed property values, and developing affordable housing on vacant lots.

The County HOME program will allocate approximately \$260,000 for rental assistance. The funds will be used for subsidy, placement and retention.

AP-60 Public Housing

Actions planned during the next year to address the needs to public housing

LMHA has an exciting challenging year planned as they focus on activities that will have great impact on their residents and voucher holders. A primary focus is the complete rehabilitation of the newly acquired River Isle Apartments in Willoughby. Phases of this activity include acquisition (06/2012), marketing and promotion of all program areas (ongoing), tenant relocation, major rehabilitation plan and re-occupancy.

During the next year the housing authority plans to replace the roof and fire systems at Washington Square and Jackson Towers and perform waterproofing at Woodlawn Homes.

The approved Annual Plan for FY beginning July 1, 2012 is posted at
http://www.hud.gov/offices/pih/pha/approved/view_approved_plans.cfm
<http://www.hud.gov/offices/pih/pha/approved/pdf/12/oh025v01.pdf>

Over the period of the previous Consolidated Plan LMHA performed property improvements using annual Capital funding and Capital funding made available as a result of the American Reinvestment and Recovery Act. Improvements included: new roofs, parking lot improvements, new decks and installation of handicapped accessible washers and dryers for the high rise properties. Additional improvements have added to the security and safety of residents, namely a security system upgrade and installation of improved outdoor lighting.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Public housing residents are involved in management in a number of means. For the past several years a board member of LMHA has been a resident of public housing or a HCV Certificate holder.

Monthly or quarterly "Meet and Greet" meetings are held at all of the agency's Public Housing properties, during which tenants are given the opportunity to obtain updates regarding LMHA and to voice their housing concerns to management. Tenants are invited to participate in LMHA-sponsored social events as well.

LMHA has launched an improved website that includes descriptions of HCV and Public Housing, forms, photos, community links and a video describing their properties and programs. This is just one of their means of outreach. LMHA is a regular participant in the Continuum of Care and of the Coalition for Housing and Support Services of Lake County, Inc.

Homeownership participation is encouraged by LMHA through their administration of a Family Self-Sufficiency Program (FSS) as well as a Homeownership Program. The FSS Program provides HCV families the opportunity to work with staff to develop a strategy to move from assistance to economic self-sufficiency. As the HCV head of household progresses through employment, LMHA will establish an escrow savings account for the family. When the family successfully completes its goals under the program, they receive a check for

the accumulated escrow funds and the interest it has earned. The Homeownership Program allows qualified HCV families the opportunity to purchase a home, with LMHA assisting with a portion of the monthly mortgage payments.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Lake Metropolitan Housing Authority is not designated as troubled. During the period of the previous Consolidated Plan the LMHA successfully dealt with performance issues. An excellent summary of the housing authority's emergence is detailed in the press release posted on LMHA website as of November 1, 2011.

"LAKE METROPOLITAN HOUSING AUTHORITY ACHIEVES HIGH PERFORMER STATUS!

The hallmark for administration of the Lake Metropolitan Housing Authority (LMHA) has been compliance, balanced with excellent customer service. In 2008, LMHA self-certified to HUD as a "troubled" agency. Since then, there have been numerous audits and improvements. Today, LMHA is pleased to announce that it has achieved High Performer Status for its Housing Choice Voucher Program.

The Section Eight Management Assessment Program (SEMAP), under the direction of the U.S. Department of Housing and Urban Development, annually measures the performance of Housing Choice Voucher (HCV) programs using 14 key indicators. Each indicator measures transactions within the HCV program. A score of 90%-100% is considered a High Performer. LMHA is certifying a score of 90% and a High Performer Rating designation for Fiscal Year ending June 30, 2011.

"The road leading LMHA away from "troubled" agency status, with a SEMAP score of 38%, has truly been a remarkable journey. These dramatically improved ratings are the result of the commitment and hard work of the staff and management team, who are dedicated to supporting individuals and families in need of affordable, decent and safe housing. While our transformation is not complete, we are well on our way," says Steven K. Knotts, Executive Director.

AP-65 Homeless and Other Special Needs Activities

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Outreach efforts in Lake County emphasize the following activities all of which are performed on an ongoing basis:

- Identifying those individuals and families that are currently homeless and other groups with a high potential for becoming homeless
- Assessing these individuals' core physical and mental health needs
- Connecting those who are currently homeless with appropriate shelter options and other services
- Providing those resistant to seeking emergency shelter with basic survival necessities
- Connecting those with a high potential for becoming homeless with agencies providing programs that focus on preventing homelessness
- Educating members of the community on homelessness and what they can do to help

A number of service agencies, non-profits and faith-based organizations conduct regular outreach to the homeless, especially those who are unsheltered. Extended Housing, Inc. via its Homeless Advisory Council, the Salvation Army with its day shelter and hot lunch program and the Karpos Ministry's evening meal program all target our county's homeless and those at risk of homelessness. These organizations help by providing valuable information on how to access mainstream programs and by directly providing essential services like nutritious meals.

In FY12, Lake County will provide \$67,000 of CDBG funds to the Ecumenical Shelter Network, Inc. This organization operates "Project Hope for the Homeless" emergency shelter that serves adult males and females as well as families with children. CDBG funds will be used for costs associated with the provision support services and aftercare to shelter guests. An additional \$10,000 will be used to support the new Families Moving First Family Homeless Day Shelter. This has been identified as an emerging need throughout the survey process.

The County will also provide \$10,000 in CDBG funds and \$19,628 in HOME for staff costs for a counselor at an emergency shelter for women and children who are victims of domestic violence.

The Lake County Federal Grants Office continues serves as the lead entity for the Lake County Continuum of Care with Program Manager staff serving as chairperson and a consultant providing administrative assistance. The draft of the "10 Year Plan to End Homelessness" has been completed and is posted on an interactive website: www.homeisinsight.org The authority and organizational structure of Continuum continues to evolve. The use of existing funding is increasingly documented to enable the county and the Continuum to identify and seek additional funding to meet homeless related needs. Lake County will provide administrative financial resources (\$12,000) to continue the growth and implementation of the Continuum and its objectives.

Outreach – One Year Goals

GOAL: Improve regular ongoing outreach education to standardize our message on the needs of the homeless and make it easier for volunteers to deliver this message to the organizations with which they work.

BENEFIT: Members of the community will develop an understanding of the issues surrounding homelessness and better understand their roles and responsibilities in addressing the problem.

ACTION: The Continuum of Care Media Team developed a white paper that uses the data from the 2012 Point of Time Count to highlight important facts and issues associated with the homeless in our county. Additional media developed includes a slide presentation with speaker's notes and a one page fact sheet handout.

GOAL: Conduct a Summer Point in Time Count to help get a more accurate idea of how many Lake County residents are homeless or at risk of imminent homelessness

BENEFIT: Continuum agencies will better understand the number of households experiencing housing crises and be able to evaluate any potential trends that may require changes to our system.

ACTION: Since 2010, Continuum of Care organizations have participated in the annual Convoy of Hope Outreach event. In 2012, the Continuum of Care is again participating in the Convoy of Hope Outreach event on June 23. During that event, which is expected to attract over 5,000 residents in need, Continuum member agencies will be available to meet with low income individuals and families and with those who are homeless or at eminent risk of becoming homeless. These households will receive information on mainstream services, public housing programs, emergency shelter, domestic violence, and much more. Additionally, the Continuum of Care will use this outreach event as an opportunity to conduct a second 2012 Point-in-Time Count. Feedback offered by the formerly homeless in our county and from surrounding Northeastern Ohio counties' Continuums indicates there are many more homeless households in Lake County than have been identified in the traditional January Counts. We believe it is critically important to understand the true size of our homeless population and hope this approach will help us get a better idea of how many additional people may need our help.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency Shelter

Our county's current efforts to provide emergency shelter include:

- Providing temporary housing for up to 45 days for those experiencing homelessness or needing to flee domestic violence
- Assessing the root causes behind an individual or family's homelessness
- Offering crisis intervention as needed
- Providing access to mainstream services and other supportive services that can quickly address issues of income, substance abuse and/or mental illness
- Helping people find and maintain stable housing going forward by providing support services via an After Care program

The following goals were originally included in our 10 Year Plan, but due to funding cuts and new information on current best practices in serving the homeless, are now being reconsidered:

- Provide 24 hour emergency shelter rather than the approximately 12 hours of shelter currently available
- Expand current emergency shelter to include more than the 35 beds it has today (or identify alternative ways to house the homeless)
- Provide separate emergency shelter for homeless families. As noted above, funding will be allocated in FY12 for Families Moving First.

Instead, the new focus is on finding ways to further reduce the overall average length of stay for shelter guests and providing day time support to families with preschool children. The current shelter hours of operation are from 7:00 p.m. to 7:00 a.m. which means families with small children are on the street once the Salvation Army closes at 1:00 p.m. each weekday.

Emergency Shelter One Year Goals:

GOAL: Reduce the average length of stay in emergency shelter by 10% each year

BENEFIT: Shorter shelter stays allow for faster bed turnover which, in turn, allows the shelter to provide temporary housing to more people without having to make capital expenditures to build more shelter space.

ACTIONS: Continue to analyze shelter HMIS data to improve our understanding of which shelter guests will benefit most from specific types of interventions. Expand AfterCare efforts to provide newly housed individuals and families with structure, weekly visits, budget coaching and other support to increase their chances for remaining stably housed.

GOAL: Provide day time support to homeless families with preschool children

BENEFIT: Reduce the trauma experienced by homeless children by giving them a safe place to stay during the afternoon; children will be able to nap and mothers will be able to rest before returning to the shelter for their evening meal.

ACTION: Work with local churches to identify space for the Family Day Shelter, locate equipment and supplies, hire one staff member and recruit and train volunteers to man the shelter

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Transitional Housing

Transitional housing provides an interim step for those individuals and families facing serious issues with maintaining stable housing. While taking part in a transitional housing program, people receive the following types of support:

- Safe and sanitary housing
 - In FY12, Lake County will allocate funds for building improvements to the Lake-Geauga Recovery Center and New Directions for Living.
- Specialized coaching and counseling to address the root causes behind the client's inability to maintain a stable home
- Reduced rents that gradually increase as clients stabilize in their situations and get a better handle on managing their money
- Help in developing a realistic plan for exiting the program and maintaining their independence

The 10 Year Plan included goals for the following transitional housing related needs:

- Provide additional programs for pregnant women who are homeless
- Provide a transitional housing program for single men

Both of these goals require a considerable amount of investigation, planning and capital expenditures to develop the additional TH units needed. COHHIO is currently reviewing information on all transitional housing programs within the state and expects to have best practices recommendations published later this year. Preliminary conversations with the other Ohio counties included with Lake County in the new BOSCO Region 5 confirmed similar needs and similar funding concerns. All agreed that this issue should be addressed once

the COHHIO recommendations are out. Without these additional units, it will continue to be difficult to reduce the length of stay in emergency shelter and to reduce recidivism within this very vulnerable population.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Lake County social services agencies and the faith based community offer a wide variety of homelessness prevention services and, given the current economic climate, the need for those services remains high. The numbers below indicate the how many 2-1-1 calls were received where callers were requesting help with problems related to food, eviction and foreclosure notices and utility shut-offs.

- 6,004 calls requested help getting food for their families
- 2,962 calls asked for help in paying their rent or mortgage
- 3,638 calls sought help with utility payments
- 3,408 calls requested emergency shelter, with 1,555 of them turned away mostly due to lack of available shelter beds

Continuum agencies and churches have constructed a very broad homeless prevention net. They recognize that offering free meals helps families reduce their food costs thus making it easier to pay this month's rent. Supporting programs that help make winter heating/summer cooling costs affordable for low income households prevents utility disconnections and keeps families housed. Offering counseling on rental and mortgage issues helps to prevent eviction or foreclosures. Again, our 2011 data indicate high levels of need within our county's households.

- 721 received mortgage modification and foreclosure prevention counseling
- 1,237 received rental counseling from the Fair Housing Resource Center
- 1,721 received emergency utility assistance
- 11,496 individuals received groceries from Food Force, a food pantry in Painesville
- 19,172 hot lunches were served at the Salvation Army
- 19,516 street meals were served at St. James/St. Mary's with the support of other local churches

Additionally, HOME funds (\$259,000) will be used for Tenant Based Rental Assistance in the form of security deposits and short term rental subsidy. These activities are associated with prevention in that they provide for placement and stabilization.

Finally, a State of Ohio Award of \$153,900 from the Housing Stability Grant, which bridges the GAP between HPRP and the developing Housing Response Crisis Program, will be utilized in FY12.

These efforts continue to help low income households stretch their already tight budgets and maintain the housing they have. Without this help, hundreds of additional families would become homeless each year adding to the trauma and instabilities already felt across the county and further straining our resources. Prevention works to keep our citizens housed and stable.

AP-75 Barriers to affordable housing

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The jurisdiction, as a county in Ohio has limited ability to impact the items noted above. Counties in Ohio have only advisory capacity to townships in matters relating to zoning and land use planning. At a city or village level, unless a contractual agreement is in place there is not even that level of influence. A county building department monitors and inspects construction as it proceeds for townships or municipalities within the county. Their level of authority to inspect residential, commercial or industrial projects varies from community to community.

Education, collaboration and planning are some of the means used by the jurisdiction to promote affordable sustainable housing. Examples of these that will likely come into play within the next fiscal year include:

- The jurisdiction does have a Fair Housing Action Plan in place that has actions planned to address the several impediments to fair housing. Zoning was noted as one of those impediments. The jurisdiction will support actions of the local agency, Fair Housing Resource Center, Inc. in its efforts to address this impediment.
- The jurisdiction's Planning Commission acts in a leadership role in the preparation and presentation of zoning workshops on at least an annual basis. Approximately 150 planners, citizens, elected officials, developers and community leaders attend this event.
- Fee waivers to a limited extent are another mechanism the jurisdiction uses to ease the burden for developers of affordable housing. This is used very sporadically.

As noted in previous sections of the plan, the County will continue to invest in housing rehabilitation programs to allow low-moderate income homeowners to continue to live in decent, safe and affordable housing. These programs, often in the form of grants, allow homeowners to utilize limited financial resources for other essential living expenses including mortgage and utilities.

AP-85 Other Actions

Actions planned to address obstacles to meeting underserved needs

As past practices have proved successful in determining community needs, the County will continue to work with all governmental jurisdictions, social service organizations, local non-profits and the business community to examine obstacles and develop strategies to effectively address them. In FY12, project to include:

- Health care services for low income residents (infant, dental, medical, \$47,000)
- Employment/Educational services for low income persons, notably those with mental illness and disabilities (\$30,000)

Actions planned to foster and maintain affordable housing

The Lake County Housing Rehabilitation Program will support, and help preserve, affordable housing stock by providing housing rehabilitation assistance programs to income eligible residents utilizing \$350,000 in CDBG funds to provide deferred loans to eligible home owners. Through the Housing Rehabilitation Program and Emergency Repair Program assistance is provided to low and moderate income homeowners to have structural improvements made to their homes that eliminate health and safety concerns, and building code violations. The County will also provide home rehabilitation funds to Hearts and Hammers and Rebuilding Together Lake County programs in Willowick and Wickliffe. These programs typically address smaller home repair needs throughout the community and leverage volunteer labor to meet the National Objectives.

In addition, the Lake County Commissioners will provide approximately \$300,000 in HOME funds to North Coast Community Homes, Extended Housing Inc., and NRP Group for various home construction projects ranging from a developmentally disabled home to senior housing development project. These activities will increase the supply of affordable and structurally sound housing for low and moderate income households and individuals in Lake County.

The County HOME program will allocate approximately \$260,000 for rental assistance. The funds will be used for subsidy, placement and retention.

The County's housing programs will continue to work over the next year to overcome the barriers of re-investment in existing affordable housing and the older neighborhoods of the County. These programs encourage private re-investment in the County's housing stock by eliminating substandard housing conditions, creating home ownership opportunities, promoting home maintenance, increasing depressed property values, and developing affordable housing on vacant lots.

Actions planned to reduce lead-based paint hazards

Lead-based paint hazard evaluation and reduction strategies will continue to be integrated into the County's housing rehabilitation programs in the next year. The County will also require contractors participating in the housing rehabilitation programs to become licensed. The County will utilize ODH and EPA licensed contractors to complete any necessary lead hazard reduction in homes rehabilitated through the housing rehabilitation programs. County staff recently met with lead-based paint staff from HUD Cleveland for an update on policies and best management practices. In FY12, Lake County will be sponsoring a lead-based paint training seminar for staff and local contractors.

The County has adopted the current HUD standards (Part 35 of CFR 24 and Section 570.608 of the CDBG regulations) for treatment of lead-based hazards in its housing assistance programs. These standards cover units that were built prior to 1978 and are or will be occupied by non-elderly households.

All housing units to be assisted by the County will be visually inspected for peeling and chipped paint surfaces. All interior and exterior painted surfaces will be inspected for defective paint. Defective paint surfaces will be assumed to be lead-based paint and will be encapsulated thoroughly or removed before repainting. All surfaces in units occupied by children under 6 years of age who have elevated blood lead levels must be tested with an XRF analyzer or other method such as sending paint chips to a laboratory for analysis.

All owners and occupants of housing units assisted by the County's rehabilitation programs will receive written notice of the hazards of lead-based paint.

Contractors will be required to take reasonable precautions to protect occupants during abatement of lead-based paint as described in Section 570.608.

Actions planned to reduce the number of poverty-level families

Lake County will actively seek additional funding sources to assist existing organizations and social services agencies that continue to expand their programs aimed at reducing the number of households with incomes below the poverty line. During the coming year, the County's resources will be targeted to assist extremely low and moderate income households to gain access to decent affordable housing, clean, safe neighborhoods, and employment opportunities. More specifically, the County is taking an aggressive approach to economic development loans to local companies. The surveys indicate the need for capital which directly relates to increased job opportunities for County residents. Funding is also planned for an employment services for the mentally disabled and educational opportunity for income eligible residents. Our goal is to provide the necessary skills for unemployed individuals to gain meaningful employment.

Eliminate Substandard Housing - Housing improvements that will benefit extremely low income households living in substandard housing. These improvements reduce the monthly housing costs and extend the useful

life of affordable housing. Programs include the County Housing Rehabilitation Program, Hearts and Hammers and Rebuilding Together Lake County.

Actions planned to develop institutional structure

The structure of the Federal grants programs contains a myriad of partners. The County provides assistance to communities and non-profit agencies to undertake public infrastructure improvements, public facility renovations, and the expansion of needed community social services through the Community Development Block Grant/HOME Program.

In addition, there are several social service agencies and organizations in the County delivering services to the public. These services range from youth programs to recreation and education programs to drug/substance abuse prevention and treatment programs to money management counseling and personal budgeting guidance. The funding for these efforts from a variety of funding sources, including local, state and federal agencies, the United Way, private foundations, donations, and service-based fees. The County provides up to 15% of its annual CDBG allocation to agencies such as the Project Hope, Forbes House, the Free Dental Clinic, and Lifeline to provide social services which meet the needs of County residents.

It is imperative that the countless entities noted above work in concert with another when addressing community development and social service needs in Lake County. Reduced funding, along with an increased need, requires an administrative and funding structure which leverages the resources, provides effective, efficient deliverables and meets the National Objectives. The County Grants office, Continuum of Care, Lake County Port Authority and Lake County Housing Coalition often facilitate, and serve as coordinators for various funding scenarios to avoid duplicated programming and identify community needs.

Furthermore, sufficient staffing must be in place. In FY12, Lake County will hire an additional CDBG staff person and maintain contracts with a Continuum of Care and Federal Grants consultant. County employees are required to attend the necessary training to ensure program compliance. Grant Subrecipients are also encouraged to attend similar trainings to ensure long term consistency with the Consolidated Plan. Grantees are required to submit performance reports to the County on a monthly basis for review and to ensure accomplishments are being met or on track.

Regarding economic development, Lake County is fortunate to have professional economic development staffs in place in several communities including the Cities of Mentor, Painesville, and Willoughby. Two countywide development organizations also provide resources and technical assistance to local businesses. The Lake County Development Council addresses development issues facing the County. The Lake County Port Authority provides assistance in financing, especially in helping small companies package Small Business Administration (SBA) 504 loans. The Port Authority also administers the newly created Economic Development Loan Fund.

The County's ability to provide CDBG funds to the Lake County Port Authority to issue loans to local companies, based on guidance from our local partners, creates tremendous employment opportunities for our low to moderate income population.

Ten (10) specific projects have been planned for the coming year. These include:

1. Public Improvements - \$159,734
2. Public Facilities - \$61,350
3. Economic Development Programs - \$400,000
4. Housing Programs - \$400,000
5. Public Services - \$179,000
6. Program Administration - \$238,811
7. Rental Subsidy and Security Deposits - \$259,216
8. County HOME Programs (Acquisition and Rehabilitation) - \$100,000
9. County HOME Programs (New Construction) - \$169,000
10. County HOME Programs Administration - \$36,468

Actions planned to enhance coordination between public and private housing and social service agencies

During the next year, the County will continue to assist several nonprofit and for-profit organizations by leveraging other private, state and federal funds for housing, social service activities and economic development with CDBG and HOME funds. The County will continue to provide resources and technical assistance.

For economic development projects, the County will continue to expand our partnership with the Lake County Port Authority. The Port will be charged with administering the newly created Economic Development Loan Fund for small to medium sized businesses. This will compliment the microloan program that has existed for the past ten years.

The Program Manager of the Lake County Federal Grants Office and Office Manager of the Lake County Planning Commission provide input and leadership to The Coalition for Housing and Support Services of Lake County, Inc. and to the Lake County Continuum of Care. The membership, mission, objectives and accomplishments of these groups can be viewed at the following websites: www.chsslc.org and www.homeisinsight.org . The County will continue to utilize the services of a consultant to provide clear direction and coordination on homelessness activities and programs in the area.

Public Housing

The Lake Metropolitan Housing Authority (LMHA) used Stimulus Funds to perform rehabilitation, and make safety and energy improvements on their three public housing complexes. Upcoming plans include the rehabilitation of a 40 unit apartment complex in the City of Willoughby as a mixed finance project with LMHA reserves, HOME/CDBG funds and an existing HUD grant award #OH12P025010 in the amount of \$2,846,581.

Program Specific Requirements

AP-90 Program Specific Requirements

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220.(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$30,906.13
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	\$0
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	
5. The amount of income from float-funded activities	\$0
Total Program Income	

Other CDBG Requirements

1. The amount of urgent need activities	N/A
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HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220.(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The jurisdiction has not used and as of the writing of this Action Plan does not anticipate using other forms of investment than those identified in HOME Program regulations at 24 CFR 92.205. Should the need to seek such other forms of investment arise and be brought to the attention of the jurisdiction HUD guidance and approval will be sought prior to program design

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The jurisdiction has long used a guideline that calls for the recapture of HOME funds used for homebuyer activities. This guideline is based upon the HOME regulations which require a period of affordability linked to the amount of HOME investment per unit. The investment is secured by a document filed with the Lake

County Recorder's Office (lien/mortgage). Upon the completion of the period of affordability the lien/mortgage is satisfied or released. If the homeowner seeks to sell their home and requests that the lien/mortgage be satisfied or released prior to the completion of the affordability period a prorated amount is required to be paid to the county. (See attached sample Mortgage/Recapture Line).

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The jurisdiction has long used a guideline based upon the HOME regulations which require the use of a document that secures the investment based upon a period of affordability linked to the amount of HOME investment per unit. The investment is secured by a document filed with the Lake County Recorder's Office Restrictive Covenant). Upon the completion of the period of affordability the Restrictive Covenant may be released. (See attached actual Restrictive Covenant.)

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The jurisdiction has not used and has no current plans to use HOME funds in this fashion thus no guidelines have been developed to regulate such a use. Should this need arise and be brought to the attention of the jurisdiction HUD guidance will be sought.

Emergency Solutions Grant (ESG)

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards will be provided by Ohio BOSCOC and the lead agency in Region 5. Lake County will follow those procedures.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Preliminary meetings with the BOSCOC Region 5 Executive Committee produced the recommendation that all local Continuums within the region will work together to develop a coordinated assessment system.

Each county will identify one person who will join the Regional Intake team to begin to work out the details

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Currently, two formerly homeless individuals are invited to join every Lake County Continuum of Care monthly meeting.

5. Describe performance standards for evaluating ESG.

Written standards will be provided by Ohio BOSCOC and the lead agency in Region 5. Lake County will follow those procedures.

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the Consolidated Plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-Displacement and Relocation Plan -- It will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under Section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will:
 - (a) Abide by the terms of the statement; and

- (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction.
-
- 5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
 - 6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, state, or local health, law enforcement, or other appropriate agency;
 - 7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with Section 3 of the Housing and Urban Development Act of 1968 and implementing regulations at 24 CFR Part 135.

Signature / Authorized Official

Date

President, Lake County Board of Commissioners

Title

SPECIFIC CDBG CERTIFICATIONS

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current Consolidated Plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums and blight. The Action Plan may include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available;
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2001 (a period specified by the grantee consisting of one, two, or three consecutive program years) shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the portion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The Jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including section 108, unless CDBG funds are used to pay the portion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In the case of properties owned and occupied by moderate-income (not low income) families, an assessment or charge may be made against the property for public

improvements financed by a source other than CDBG funds if the Jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-Discrimination laws -- The grants will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3620), and implementing regulations.

Lead-Based Paint -- Its notification, inspection, testing and abatement procedures concerning lead-based paint will comply with the requirements of 24 CFR § 570.608;

Compliance with Laws -- It will comply with applicable laws.

Signature / Authorized Official

Date

President, Lake County Board of Commissioners

Title

SPECIFIC HOME CERTIFICATIONS

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's annual approved housing strategy for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

Signature / Authorized Official

Date

President, Lake County Board of Commissioners

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies. (This is the information to which jurisdictions certify).
4. For grantees who are individuals, Alternate II applies. (Not applicable jurisdictions.)
5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).

7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

LAKE COUNTY, OHIO County-wide
(excluding the City of Mentor and Waite Hill Village)

9. Definitions of terms in the Non-procurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C.812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of no contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are not on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

HUD, Lake County, Ohio, has:

- (A) Furnished citizens with information required by §570.704 (a) (2) (i);
- (B) Held at least one public hearing to obtain the views of citizens on community development and housing needs; and
- (C) Prepared its application in accordance with §570.704 (a) (1) (iv) and made the application available to the public.
- (D) It is following a detailed citizen participation plan which meets the requirements described in §570.704 (a) (2).
- (E) Lake County, Ohio, will affirmatively further fair housing, and the guaranteed loan funds will be administered in compliance with:
 - (i) Title VI of the Civil Rights Act of 1964 (Pub. L. 88-352, 42 U.S.C. 2000d *et seq*); and
 - (ii) The Fair Housing Act (42 U.S.C. 3601-20).
- (F) In the aggregate, at least 70 percent of all CDBG funds, as defined at §570.3 (e), to be expended during the one, two, or three consecutive years specified by the public entity for its CDBG program will be for activities which benefit low and moderate income persons, as described in criteria at §570.208 (a).
- (G) It will comply with the requirements governing displacement, relocation, real property acquisition, and the replacement of low and moderate income housing described in §570.606.
- (H) It will comply with the requirements of §570.200 (c) (2) with regard to the use of special assessments to recover the capital costs of activities assisted with guaranteed loan funds.
- (I) It will comply with the other provisions of the Act and with other applicable laws.
- (J) (Where applicable, the public entity may also include the following additional certification.) It lacks sufficient resources from funds provided under Subpart M or program income to allow it to comply with the provisions of §570.200 (c) (2), and it must therefore assess properties owned and occupied by moderate income persons, to recover the guaranteed loan funded portion of the capital cost without paying such assessments in their behalf from guaranteed loan funds.

Signature / Authorized Official

Date

President, Lake County Board of Commissioners

Title